

Exhibit 2



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

MARK CHEFFO

mark.cheffo@dechert.com
+1 212 698 3814 Direct
+1 212 698 3599 Fax

December 16, 2018

VIA E-MAIL

Attorney General Mike DeWine
c/o Mark H. Troutman, Esq.
Isaac Wiles Burkholder & Teetor, LLC
Two Miranova Place, Suite 700
Columbus, OH 43215-5098
mtroutman@isaacwiles.com

Mike Moore, Esq.
Mike Moore Law Firm, LLC
P.O. Box 321048
Flowood, MS 39232
mm@mikemoorelawfirm.com

Re: *In re National Prescription Opiate Litigation*, Case No. 1:17-MD-2804

Dear Gentlemen:

I am writing on behalf of certain manufacturer defendants in the *In Re Opiate Litigation* pending before Judge Polster in Cleveland.

We understand that Mr. DeWine and Mr. Moore will be featured in a segment scheduled to air tonight on 60 Minutes regarding the opioid crisis. Of course, we have not seen the segment, nor do we have the full transcript or context. But, we have seen the “teaser” for the segment, and it has raised some significant concerns and questions.

First, based on the limited, and admittedly incomplete information, we have seen, we are concerned that statements provided to 60 Minutes may violate the letter and/or spirit of Judge Polster’s protective order regarding ARCOS data. Second, we are concerned that statements made to 60 Minutes may violate certain provisions of Ohio’s laws and ethical provisions, including, but not limited to, Ohio’s “Trial Publicity” ethics rules.

As noted, because we do not have complete information, and do not yet know what was provided, or what will air, we can’t be more specific and it’s not clear what, if any, violations occurred. However, since Mr. DeWine and Mr. Moore know what was given or stated to 60



Attorney General Mike DeWine
c/o Mark H. Troutman, Esq.
Mike Moore, Esq.
December 16, 2018
Page 2

Minutes, we are providing this notice in advance of the airing to allow you the opportunity to take appropriate action to prevent or remediate any violations of law or the protective order, to the extent that they occurred, before the segment airs and potentially causes significant and irreparable harm to one or more defendants. As you can understand, defendants reserve our rights concerning this matter until after we have a chance to review what ultimately airs on the segment.

Thank you both for your attention to this important matter.

Please feel free to contact me if you have any questions.

Sincerely,

Mark S. Cheffo

Mark S. Cheffo